

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

---

PATRICIA DONAHUE, Individually, and  
in her capacity as Administratrix of the  
Estate of Michael J. Donahue, MICHAEL  
T. DONAHUE, SHAWN DONAHUE,  
THOMAS DONAHUE,  
Plaintiffs,

v.

FEDERAL BUREAU OF  
INVESTIGATION, JOHN J. CONNOLLY,  
JR., JOHN M. MORRIS, LAWRENCE  
SARHATT, ROBERT FITZPATRICK,  
UNITED STATES OF AMERICA  
Defendants.

---

DOCKET NO: 01-CV-10433 RCL

**AUTOMATIC DISCLOSURE OF  
DEFENDANT, LAWRENCE SARHATT**

Defendant, Lawrence Sarhatt hereby submits the following disclosure pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Local Rule 26.1(A) and 26.2(A).

**A. Individuals Likely To Have Discoverable Information**

Defendant is not aware of any particular individuals knowledgeable or who have discoverable information pertaining to the allegations in plaintiffs' complaint other than those individuals or entities contained in various documents produced by the government, court testimony or media reports and other related documents and discovery in this and the related proceedings. Defendant would likewise refer to the individuals identified by the plaintiffs in their Rule 26 disclosures recently filed with the Court. Defendant further states that investigation and discovery remain ongoing and reserves the right to supplement this response.

**B. Documents, Data Compilations And Tangible Things**

The defendant is not aware of any relevant documents other than what has been made available by the government and otherwise part of the depositions, trial testimony and associated exhibits that have resulted or been produced in the related proceedings. Defendant is likewise not aware of any other documents beyond what the plaintiffs have identified as part of their Rule 26 disclosure.

**C. Computation of Damages, Documents Related To Damages**

Not applicable.

**D. Insurance Agreements**

Not applicable.

Respectfully submitted,  
The Defendant,  
LAWRENCE SARHATT  
By his attorneys,  
**MORRISON MAHONEY LLP**

/s/ Tory A. Weigand

---

Tory A. Weigand, BBO #548553  
250 Summer Street  
Boston, MA 02210  
617-439-7500

I hereby certify that a true copy of the  
above document was served upon the attorney  
of record for each party by mail on **August 31, 2004**

/s/Tory A. Weigand

---

Tory A. Weigand